

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS	:	
716 North Barrett Lane	:	
Christiana, DE 19702	:	DISTRICT COURT
PLAINTIFF	:	
	:	
v.	:	No. 04-251 JJF
	:	
JO ELLEN CHAPEN SHELDON	:	
708 Pebble Beach Drive	:	
Elkton, MD 21921	:	
	:	TRIAL BY JURY DEMANDED
DEFENDANT	:	

DEFENDANT'S REQUEST FOR PRODUCTION

The defendant(s) request the plaintiff(s) to produce for examination and copying at the office of the attorney for the defendant(s), on or before thirty (30) days from receipt of this Request:

1. All hospital records, doctors' summaries and reports, reports concerning any physical tests performed on or concerning the plaintiff(s) and any other matter in writing prepared by or on behalf of any person trained in the healing arts concerning the plaintiff(s)' past, present or future physical condition insofar as such matters in writing may be in the possession of the plaintiff(s) or their attorney or available to them upon request by them to any doctor, hospital or other person trained in the healing arts.

2. Copies of all statements, bills or canceled checks showing the amount charged for services rendered to the plaintiff(s) or items sold to the plaintiff(s) in connection with the care of their alleged physical injuries.

3. Copies of all photographs, sketches, diagrams or

other drawings taken by or prepared by you or on your behalf, in your possession or available to you concerning any aspect of the litigation.

4. Copies of all reports of investigation, findings of fact, observation of facts or circumstances, or any other matter relating to any aspect of the litigation.

5. Copies of any reports by any person qualifying as an expert containing opinions and/or facts on which opinions are based concerning any aspect of the litigation.

6. Copies of any and all writings in your possession or available to you identified or referred to in any way in your answers to defendants(s) interrogatories.

7. Copies of any and all writings in your possession or available to you in addition to the items specified in previous sections of this Request for Production which pertain in any way to the issues raised by the pleadings herein.

8. Copies of any and all writings which you intend to rely upon in any way at trial.

9. Copies of all state and federal income tax returns for the years 2000 to present.

/S/Beth H. Christman
BETH H. CHRISTMAN, ESQ.
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Attorney for Defendant

DATED: May 12, 2005